

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF NEXHAT MELA

COMES NOW the declarant, Nexhat Mela, duly sworn upon oath, deposes and testifies as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached, as Exhibit A to this Declaration, is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at One Liberty Plaza (located across the street from the World Trade Center) on the 7th Floor when the terrorist attacks of the World Trade Center Towers occurred. At the time of the attacks, I was employed by Triangle Services as a maintenance worker.

4. On September 11, 2001, I began my shift at 8:00 am. I worked on the 7th, 8th and 12th floors of One Liberty Plaza, cleaning and making repairs. Around 9:00 a.m., I heard a loud explosion. Everyone began trying to exit the building, but the elevators were full. I took the emergency service elevator down to the 1st floor. As I exited the building, people were running and screaming. It was complete chaos. At that time, the second airplane hit the South Tower, and

I watched in horror as fire, smoke, and debris fell around me and the people on the crowded street. The scene looked like a war zone. As I tried to escape from the area, I fell down several times and multiple people began stepping on me as they also escaped, which caused injuries to my back and neck. As the World Trade Center Towers then began to collapse, I could not decide which way to run to avoid further injury. While the area was covered in thick dust and debris, I saw a man with a flashlight, and he directed me towards the water front. As I then ran to safety and away from Ground Zero, I began to experience heart palpitations from all of the intense stress that I was experiencing. I also experienced dizziness and shortness of breath from all the dust and debris that I was inhaling as I made my escape.

5. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. Because of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: injuries to my cervical and lumbar spine, paroxysmal arterial fibrillation, dizziness, dyspnea due to exposure to excessive dust and trauma, allergic conjunctivitis to both eyes due to debris, a lung nodule, obstructive sleep apnea, periodic limb movement disorder, post-traumatic stress disorder, panic attacks, and anxiety.

7. Due to these physical and emotional injuries, I am no longer able to work, having been deemed functionally and totally disabled from multi-factorial causes. I cannot be exposed to excessive dust or excessive stress as these exposures may trigger recurring cardiac arrhythmia.

8. I suffered, and continue to suffer, severe emotional distress and panic attacks because of the above terrorist attacks. The panic attacks were characterized by heightened anxiety,

shortness of breath and dizziness, as well as complaints of insomnia, flashbacks, nightmares and heightened startle reflex.

9. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-001686) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 15 day of September 2020.



Signature of Declarant, Nexhat Mela

**EXHIBITS
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